

United States Department of Justice
Office of the United States Trustee
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Lisa L. Lambert
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Juliet Sarkessian
PA Bar No. 57872 (also NY)
for the United States Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

**NATIONAL RIFLE ASSOCIATION OF
AMERICA and SEA GIRT LLC**

Debtors.

Chapter 11

Case No. 21-30085-hdh11

Jointly Administered

Hearing Date: 2/24/2021

Hearing Time: 2:00 p.m.

**U.S. TRUSTEE'S WITNESS AND EXHIBIT LIST FOR HEARING ON
DEBTORS' APPLICATION TO EMPLOY BREWER, ATTORNEYS & COUNSELORS AS
SPECIAL COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION**

TO THE HONORABLE HARLIN D. HALE,
UNITED STATES BANKRUPTCY JUDGE:

The United States Trustee for Region 6 designates the following witnesses and exhibits for the hearing on Debtors' Application for Entry of Order Pursuant to sections 105 (a), 327(e), 329, and 1107(b) of the Bankruptcy Code Authorizing and Approving the Employment and Retention Effective as of the Petition Date of Brewer, Attorneys & Counselors as Special Counsel for the Debtors and Debtors in Possession:

Witnesses

1. William A. Brewer III of Brewer, Attorneys & Counselors;
2. Michael J. Collins of Brewer, Attorneys & Counselors;

3. Carolyn Meadows of the National Rifle Association;
4. John C. Frazer of the National Rifle Association;
5. Wayne LaPierre of the National Rifle Association; and
6. Any witness designated on another party's witness list.

Exhibits

Exhibit Identification	Exhibit	Offer	Admit
Summons and Complaint in <i>People of the State of New York v. The National Rifle Ass'n of Am., et al.</i> , Index No. 451625/2020 (Sup. Ct. N.Y. Cnty.), NYSCEF Docket No. 1, filed Aug. 6, 2020	A		
Letter from Wayne LaPierre to NRA members and supporters dated Jan. 15, 2021	B		
Press Release of Jan.15, 2021	C		
<i>Questions & Answers</i> , www.nraforward.org	D		
Memorandum Opinion and Order, D.I. 166 in <i>National Rifle Ass'n of Am. v. Ackerman McQueen, Inc.</i> , et al., Case No. 3:19-cv-2074 (N.D. Tex., Sept. 14, 2020)	E		
<i>The National Rifle Ass'n of Am. v. North</i> , 903843-20, 2020 N.Y. Slip Op. 51109(U), 130 N.Y.S. 3d 925 (Table), 2020 N.Y. Misc. LEXIS 6979, at * 8-9 (Sup. Ct. Albany Cnty, Oct. 2, 2020)	F		
NRA IRS Form 990 for 2018 ¹	G		
NRA IRS Form 990 for 2019	H		
Statement of Financial Affairs of Debtor National Rifle Association of America filed in these cases on Feb. 15, 2021, at D.I. 162	I		
Defendant's Answer to Amended Complaint in <i>National Rifle Ass'n v. Oliver North</i> , 903843-20 (Sup. Ct. Albany Cnty, Aug. 31, 2020), NYSCEF Docket No. 41	J		

¹ The NRA's IRS Form 990 for 2018 and 2019 are publicly available.

Exhibits may be re-lettered if parties agree on summary table. The United States Trustee reserves the right to supplement this list of witnesses and exhibits based on any additional information obtained through discovery or other sources. The United States Trustee reserves the right to use any exhibit designated on another party's list. An exhibit binder will be provided at trial. The U.S. Trustee reserves the right to call additional witnesses or introduce additional exhibits in rebuttal.

DATED: February 18, 2021

Respectfully submitted,

WILLIAM T. NEARY
UNITED STATES TRUSTEE

By: /s/ Lisa L. Lambert

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By: /s/ Juliet Sarkessian

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Certificate of Service

I certify that on February 18, 2021, I served a true copy of this document either by electronic case filing and/or by email on the following parties and on those requesting ECF notice.

By: /s/ Lisa L. Lambert
Lisa L. Lambert,
Assistant United States Trustee

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